

ID: CCA_2009031111165650

Number: **200914046**

Office:

Release Date: 4/3/2009

UILC: 7425.00-00

From:

Sent: Wednesday, March 11, 2009 11:17:04 AM

To:

Cc:

Subject: RE: Timothy J. Russell et ux v. United States et al. No. 07-1436 CA10

Russell (attached) was a favorable opinion for us. It held the Internal Revenue Code preempts state law; therefore, since notice of sale wasn't given as required by the Code, the property was sold subject to the federal tax lien.